

SECRET

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

7433057-99FPI:1255

**MCLEAN YOUTH ATHLETICS and  
MCLEAN YOUTH LACROSSE**

## Plaintiffs

**V.**

UNITED STATES DEPARTMENT  
OF INTERIOR NATIONAL PARK  
SERVICE

Defendant

## CIVIL ACTION

1:13CV1257  
LDG/JFA

## COMPLAINT

This complaint seeks a temporary restraining order and preliminary and permanent injunction Ordering the United States Department of Interior National Park Service to re-open Langley Forks Park immediately.

## JURISDICTION

This court has jurisdiction over this dispute under Title 28 U.S.C., §§ 1346 and 1391, as the Langley Forks Park sits on federal park land controlled by the United States Department of Interior National Park Service in the Eastern District of Virginia. Further, the United States Department of Interior National Park Service has given Fairfax County Park Authority (FCPA) the authority to manage and maintain the Langley Forks Park.

The McLean Youth Athletics, on behalf of McLean Youth Lacrosse, has contracted with the Fairfax County Park Authority to use the Langley Forks fields on Wednesdays and Fridays in the fall 2013. McLean Youth Lacrosse received a permit for the fall of 2013 in return for a fee of \$5,000 paid to the Fairfax County Park Authority. The United States Department of Interior

National Park Service provides no substantive services and incurs no expense, and is not a signatory on this contract.

Upon information and belief, the United States Department of Interior National Park Service ordered the Superintendent of the George Washington Parkway, United States Park Service to instruct the Fairfax County Park Authority to close the Langley Forks Park when the government shutdown occurred on October 1, 2013.

Fairfax County Park Authority has complied with this order to the detriment of hundreds of youth lacrosse players, who are unable to find alternative locations to practice and play games.

As a result, McLean Youth Lacrosse has suffered the loss of several practice and game days and will continue to suffer the loss of its use of Langley Forks Park in the future, unless this court issues Preliminary Injunctive relief.

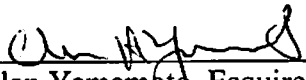
The United States Department of Interior National Park Service has acted arbitrarily and capriciously in ordering this park closed when it has no real interest therein and bears no expense in its operation.

Upon information and belief the Fairfax County Park Authority and the Fairfax County Board of Supervisors have attempted to have Langley Forks Park re-opened, but the United States Department of Interior National Park Service has unjustifiably refused to do so.

Therefore, to prevent further irreparable harm to the McLean Youth Lacrosse and its players, the plaintiffs requests that this court order the park re-opened immediately, as well as any other relief the court deems appropriate.

The plaintiffs ask for this relief pursuant to Fed. R. Civ. Proc. 65 and ask that the hearing be held immediately and without service on defendants to prevent further irreparable injury, pursuant to the affidavit filed with this complaint.

MCLEAN YOUTH ATHLETICS  
MCLEAN YOUTH LACROSSE



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